Remarks/Arguments:

Claims 1-5 and 7-11 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Moriwake, et al. (U.S. Patent No. 6,201,581). It is respectfully submitted, however, that these claims are patentable over the art of record for the reasons set forth below.

Applicants' invention, as recited by claim 1, includes a feature which is neither disclosed nor suggested by the art of record, namely;

> . . . a screen signal generator for generating a screen signal by using the source video signal and the screen reference color, the screen signal indicating a screen component included in the source video signal,
>
> wherein said key signal generator generates the mixing key signal by using the source video signal and the screen reference color, and said mixing processor subtracts the screen signal from the source video signal based on the mixing key signal to obtain the foreground object component and the foreground object component is mixed with the background video signal based on the mixing key signal.

This feature is supported by the originally filed application at page 11, line 22 - page 12, line 19 and by Figure 8. More specifically, this feature is supported by Figure 8 and formulas 13(a), 13(b) and 13(c). No new matter has been added.

Moriwake does not disclose a way to obtain mixed video signal V_m, such as in Figure 8 and formulas 13(a), 13(b) and 13(c).

Formula 17 disclosed in Moriwake may look similar to Applicants' formulas 13(a), 13(b) and 13(c). However, the second term in the right hand side of formula 17, YOC, UOC, and VOC are constant values. Because these terms are constant values, noises on Moriwake's screen tend to appear in the mixed video signal. This is consistent with the explanation provided in Applicants' background B of the present invention (page 4, lines 21-25).

By contrast, in Applicants' formulas 13(a), 13(b), and 13(c), the first term SY, SCB, and SCR represent a source video signal V_s and X_y, Xcb and Xcr represent a screen signal V_x which are changing based on the source video signal. Thus, because these values are not constant, noises on the screen are not likely to appear in the mixed video signal. As this feature is neither disclosed nor suggested by Moriwake, claim 1 is patentable over Moriwake.

Claim 7 is a method claim which includes features similar to those described above with reference to claim 1. Thus, claim 7 is also patentable over the art of record.

The remaining dependent claims are patentable by virtue of their dependency on allowable claims 1 and 7.

Claims 13-18 are newly added.

Claim 13 corresponds to allowable original claim 6. Claim 16 corresponds to allowable original claim 12. Dependent claims 14 and 15 correspond to original claims 2 and 3, respectively. Dependent claims 17 and 18 correspond to original claims 8 and 9, respectively.

In view of the amendments and arguments set forth above, the above-identified application is in condition for allowance which action is respectfully requested.

Respectfully submitted,

Lawrence E. Ashery, Reg. No. 34,515
Attorney for Applicants

LEA:ds

Dated: April 5, 2004

P.O. Box 980
Valley Forge, PA 19482
(610) 407-0700

The Commissioner for Patents is hereby authorized to charge payment to Deposit Account No. **18-0350** of any fees associated with this communication.

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail, with sufficient postage, in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on:

April 5, 2004

DS_I:\MAT\8130US\AMEND_02.DOC